

IN RE FOREFRONT DATA BREACH LITIGATION

This Document Relates to: ALL ACTIONS.

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**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY
APPROVAL OF THE CLASS ACTION SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23(e), Plaintiffs Judith Leitermann, Lynn Anderson, and Milan E. Kunzelmann (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, respectfully move this Court for the entry of the proposed Preliminary Approval Order submitted herewith, which seeks preliminary approval of a proposed class action settlement (the “Settlement”) and certification of a proposed settlement class (the “Settlement Class”) as defined therein. In support of this request, Plaintiffs state the following:

1. The terms of the Settlement are set forth in the Class Action Settlement Agreement and Release that was executed on August 31, 2022, attached as Exhibit 1 to Plaintiffs' Memorandum of Law in Support of Their Unopposed Motion for Preliminary Approval of the Class Action Settlement (the "Memorandum"), filed contemporaneously herewith.

2. The relief sought in this Motion is supported by: the Declarations of Tina Wolfson, Gary M. Klinger, Brandon Schwartz, and Robert Siciliano, attached as Exhibits 2-5 to the

Memorandum; and Plaintiffs' Memorandum of Law in Support of Their Unopposed Motion for Preliminary Approval of the Class Action Settlement.

3. Defendants, Forefront Dermatology, S.C. and Forefront Management LLC, do not oppose the relief requested in this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Preliminary Approval of Class Action Settlement, conditionally certifying a Settlement Class, granting preliminary approval of the Class Action Settlement Agreement and Release, approving the form and manner of Notice, and scheduling a Final Approval Hearing.

Dated: September 1, 2022

Respectfully submitted,

/s/ Andrew W. Ferich

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 1, 2022, the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on the following ECF-registered counsel of record.

/s/ Andrew W. Ferich
Andrew W. Ferich